

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MAVERICK RECORDING COMPANY, a)	
California joint venture; WARNER BROS.)	CIVIL ACTION No. 1:06-CV-00582-KAJ
RECORDS INC., a Delaware corporation;)	
PRIORITY RECORDS LLC, a California)	
limited liability company; UMG)	
RECORDINGS, INC., a Delaware)	
corporation; SONY BMG MUSIC)	
ENTERTAINMENT, a Delaware general)	
partnership; BMG MUSIC, a New York)	
general partnership; and ARISTA)	
RECORDS LLC, a Delaware limited)	
liability company,)	
)	
)	
Plaintiffs,)	
)	
vs.)	
)	
DAVE MICKEL,)	
)	
)	
Defendant.)	

PLAINTIFFS' CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
TO DEFENDANT'S COUNTERCLAIM

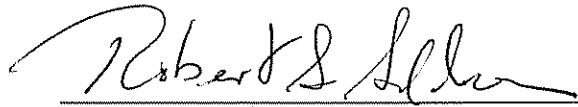
Plaintiffs move this Court for a thirty day extension of time to file an answer or motion to dismiss to Defendant's counterclaim. Plaintiffs are currently investigating Defendant's claim that he was not responsible for the alleged copyright infringement. Plaintiffs intend to file a motion to dismiss this counterclaim but would like an additional 30 days to conduct their investigation, prior to doing so, in order to save the Court and the parties the time and expense of briefing and entertaining such a motion, while their investigation is underway. Although this is the third extension to respond to Defendant's counterclaim requested by Plaintiffs, the parties are hopeful that a resolution can be reached in the next 30 days and, therefore, it will be unnecessary

to burden the Court with a motion to dismiss. If the case is not resolved by February 15, 2007, Plaintiffs will proceed to file their Motion to Dismiss. This brief extension will not result in any prejudice to any party and will not materially delay this case, which was just answered on October 26, 2006. Defendant consents to this brief extension.

WHEREFORE, Plaintiffs respectfully request a 30-day extension of time, through February 15, 2007, to file an answer or motion to dismiss Defendant's counterclaim.

DATED: _____

1/14/07



Robert S. Goldman (DE Bar No. 2508)
Lisa C. McLaughlin (DE Bar No. 3113)
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Attorneys for Plaintiffs MAVERICK
RECORDING COMPANY; WARNER
BROS. RECORDS INC.; PRIORITY
RECORDS LLC; UMG RECORDINGS,
INC.; SONY BMG MUSIC
ENTERTAINMENT; BMG MUSIC; and
ARISTA RECORDS LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 16, 2007, a copy of the foregoing
PLAINTIFFS' CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
TO DEFENDANT'S COUNTERCLAIMS was served upon the Defendant via United States
Mail as follows:

JOHN ANDRADE
116 West Water St.
PO Box 598
Dover, DE 19903

Attorney for Defendant

A handwritten signature in black ink, appearing to read "Robert S. Goldman", is written over a horizontal line.

Robert S. Goldman (DE Bar No. 2508)
Lisa C. McLaughlin (DE Bar No. 3113)
PHILLIPS, GOLDMAN & SPENCE, P.A.
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**[PROPOSED] ORDER GRANTING PLAINTIFFS' CONSENT MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE TO DEFENDANT'S COUNTERCLAIM**

This matter comes before the Court on Plaintiffs' Consent Motion to for Extension of Time to File Response to Defendant's Counterclaim. Having reviewed the Motion and being fully advised, the Court FINDS that good cause exists to extend the deadline for Plaintiffs to file their response to Defendant's counterclaim thirty days, through February 15, 2006 and SO ORDERS.

Date: _____	BY THE COURT
	UNITED STATES DISTRICT COURT JUDGE